

**AIR POLLUTION CONTROL OPERATION PERMIT**

EI FACILITY NO. 241063570

PERMIT NO. 241063570-P01

TYPE: Part 70

In compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Kitzinger Cooperage Corporation

Street Address: 2529 East Norwich Avenue, St. Francis, Milwaukee County, Wisconsin 53207

Responsible Official, & Title: Mark Furgason, President

is authorized to operate an existing plant for reconditioning steel and plastic drums in conformity with the conditions herein.

THIS OPERATION PERMIT EXPIRES ON DECEMBER 21, 2009. A RENEWAL APPLICATION MUST BE SUBMITTED AT LEAST 12 MONTHS, BUT NOT MORE THAN 18 MONTHS, PRIOR TO THIS EXPIRATION DATE. [SEC. NR 407.09(1)(B)1., WIS. ADM. CODE].

This source may not operate after this operation permit expires unless a timely and complete application for renewal of this operation permit has been submitted. If a timely and complete application for renewal has been submitted, the existing operation permit will not expire until the renewal application has been finally acted upon by DNR. [s.285.66(3), Wis. Stats. and NR 407.04(2), Wis. Adm. Code].

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Milwaukee, Wisconsin on December 21, 2005.

STATE OF WISCONSIN  
DEPARTMENT OF NATURAL RESOURCES

For the Secretary

By /s/ Richard Wulk for DS  
Richard Wulk for Daniel Schramm  
Air Program Supervisor  
Milwaukee Regional Headquarters

## Preamble

An Asterisk "\*" throughout this document denotes legal authority, limitations and conditions which are not federally enforceable.

Concurrent Permit Actions Performed as Part of the Review and Issuance of Permit 241063570-P01: None.

Construction Permits Issued In Conjunction with Permit 241063570-P01 under sec. 285.61(8), Wis. Stats.: None

Revised Construction Permits Issued in Conjunction with Permit 241063570-P01 under sec. NR 406.11, Wis. Adm. Code: None

Operation (CONOP) Permits Issued in Conjunction with Permit 241063570-P01 under sec. 285.62(7)(b), Wis. Stats.: None

Revised Operation Permits Issued in Conjunction with Permit 241063570-P01 under secs. NR 407.11, 407.12, 407.13 and/or 407.14, Wis. Adm. Code: None

The following permits, orders, etc. are adopted, under secs. 285.65(3), Wis. Stats., NR 406.11(1)(c) and (d), NR 407.09(2)(d) and NR 407.15(3) and (4), Wis. Adm. Code, by Permit 241063570-P01 which then becomes the primary enforceable document: Administrative Order dated August 5, 1987 relating to Internal Offsets

## STACK AND PROCESS INDEX

- A. Stack S08 exhausting Boiler B20, a Cleaver Brooks 100 HP Boiler (Norwich Plant) installed in 1969 and rated at 5.2 mmBtu/hr maximum.
- B. Stack S09 identifies fugitive emissions in Process P28, a product recovery process (Norwich Plant) installed in 1990.
- C. Stack S10 exhausting Process P30, a reclamation furnace (Norwich Plant) installed in June, 1976 and rated at 16.0 mmBtu/hr maximum.
- D. Stack S11 exhausting Process P31, a shot blaster (Norwich Plant) installed in August, 1974.
- E. Stacks S12, S12A, S12B and S12C (Norwich Plant) exhausting Process P32, an interior lining process installed in June, 1977 whose curing oven is rated at 4.55 mmBtu/hr maximum and controlled by waterwash particulate filter.
- F. Stacks S11 and S54 exhausting Process P54, a small shot blaster installed in January, 1959.
- G. Stacks S12, S12A, S12B and S12C exhausting Process P33, a lid lining process installed in June, 1977 and controlled by a waterwash particulate filter.

- H. Stacks S12 and S55 (Norwich Plant) exhausting Process P34, a exterior coating process installed in June, 1977 and controlled by a waterwash particulate filter.
- I. Stack S13 (Norwich Plant) exhausting Process P35, a special colors paint booth installed in 1980 and controlled by a dry particulate filter.
- J. Stacks S50, S51, S52 and S53 (Norwich Plant) exhausting Process P50, a pre-flush, caustic wash holding tank and gas fired dryer installed at an unknown date whose dryer is rated at 0.75 mmBtu/hr maximum.
- K. Stacks S14 and S56 (Norwich Plant) exhausting Process P36, a small drum coating booth and gas-fired oven rated at 1.0 mmBtu/hr maximum and installed in 1981 and controlled by a dry filter.
- L. Stacks S57, S58 and S59 (Norwich Plant) exhausting Process P60, a new pre-flush caustic wash holding tank and gas-fired dryer rated at 1.3 mmBtu/hr maximum and installed in January, 1995.
- M. Stack S21 (Penn. Plant) exhausting Process P41, a caustic paint softener installed in July, 1995 and controlled with a wet scrubber.
- N. Stacks S21, S62, S63, S64 and S65 (Penn. Plant) exhausting Process P42, an internal wash and deruster process consisting of preflush, wash water holding tank, HCl holding tank, water rinse, caustic holding tank and neutralizer rated at 4.5 mmBtu/hr maximum installed in July, 1995 and controlled with a wet scrubber.
- O. Stacks S22 and S70 (Penn. Plant) exhausting Process P43, a paint booth with curing oven rated at 5.0 mmBtu/hr maximum installed July, 1995 and controlled with a dry filter.
- P. Stacks S21, S60, S61 and S66 (Penn. Plant) exhausting Process P80, a pre-flush, caustic wash holding tank and gas-fired dryer installed in July, 1995 and rated at 4.45 mmBtu/hr maximum.
- Q. Stacks S21, S67, S68 and S69 (Penn. Plant) exhausting Process P90, Tote caustic wash and gas-fired dryer installed in July, 1995 rated at 6.0 mmBtu/hr maximum.
- R. Stack S44 identifies fugitives in Process P44, a brush-on stripper process installed in July, 1995.

Permit Shield - Unless precluded by the Administrator of the USEPA, compliance with all emission limitations in this operation permit is considered to be compliance with all emission limitations established under secs. 285.01 to 285.87, Wis. Stats., and emission limitations under the federal clean air act, that are applicable to the source if the permit includes the applicable limitation or if the Department determines that the emission limitations do not apply. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source: None.

Part I -- The headings for the areas in the permit are defined below. The legal authority for these limitations or methods follows them in [brackets].

Pollutant -- This area will note which pollutant is being regulated by the permit.

**Limitations --** This area will list all applicable emission limitations that apply to the source, including case-by-case limitations such as Latest Available Control Techniques (LACT), Best Available Control Technology (BACT), or Lowest Achievable Emission Rate (LAER). It will also list any voluntary restrictions on hours of operation, raw material use, or production rate requested by the permittee to limit potential to emit.

**Compliance Demonstration --** The compliance demonstration methods outlined in this area may be used to demonstrate compliance with the associated emission limit or work practice standard listed under the corresponding Limitations column. The compliance demonstration area contains limits on parameters or other mechanisms that will be monitored periodically to ensure compliance with the limitations. The requirement to test as well as initial and periodic test schedules, if testing is required, will be stated here. Notwithstanding the compliance determination methods which the owner or operator of a sources is authorized to use under ch. NR 439, Wis. Adm. Code, the Department may use any relevant information or appropriate method to determine a source's compliance with applicable emission limitations.

**Reference Test Methods, Recordkeeping, and Monitoring Requirements --** Specific USEPA Reference test methods or other approved test methods will be contained in this area and are the methods that must be used whenever testing is required. A reference test method will be listed even if no testing is immediately required. Also included in this area are any recordkeeping requirements and their frequency and reporting requirements. Accuracy of monitoring equipment shall meet, at a minimum, the requirements of sec. NR 439.055(3) and (4), Wis. Adm. Code, as specified in Part II of this permit.

**Condition Type --** This area will specify other conditions that are applicable to the entire facility that may not be tied to one specific pollutant.

**Conditions --** Specific conditions usually applicable to the entire facility or compliance requirements.

**Compliance Demonstration --** This area contains monitoring and testing requirements and methods to demonstrate compliance with the conditions.

**PART II --** This section contains the general limitations that the permittee must abide by. These requirements are standard for most sources of air pollutants so they are included in this section with every permit.

**PART II**  
**GENERAL PERMIT CONDITIONS**  
**FOR DIRECT STATIONARY SOURCES**

**A. Scope**

This permit is valid only for the structure, building, facility, equipment or operation specifically identified herein. All emissions authorized hereby shall be in compliance with the terms and conditions of Parts I and II of this permit. (s. 285.60(7), Wis. Stats.)

**B. Emissions Prohibited**

Unless the Department has approved an exception under s. NR 436.03(2), no person may cause, allow, or permit emissions of any air contaminant into the ambient air in excess of the limits set in chs. NR 400 to 499, Wis. Adm. Code. (s. NR 436.03(1), Wis. Adm. Code)

**C. General Emission Limits**

- <sup>1</sup>. No person may cause, allow, or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution. (s. NR 415.03, Wis. Adm. Code).
2. No person may cause, allow, or permit any materials to be handled, transported, or stored without taking precautions to prevent particulate matter from becoming airborne. Nor may a person allow a structure, a parking lot, or a road to be used, constructed, altered, repaired, sand blasted or demolished without taking such precautions. Such precautions shall include, but not be limited to the following (s. NR 415.04, Wis. Adm. Code):
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, or construction operations.
  - b. Application of asphalt, oil, water, suitable chemicals, or plastic covering on dirt roads, material stockpiles, and other surfaces which can create airborne dust, provided such application does not create a hydrocarbon, odor, or water pollution problem.
  - c. Installation and use of hoods, fans and air cleaning devices to enclose and vent the areas where dusty materials are handled.
  - d. Covering or securing of materials likely to become airborne while being moved on public roads, railroads, or navigable waters.
  - e. Conduct of agricultural practices such as tilling of land or application of fertilizers in such manner as not to create air pollution.
  - f. The paving or maintenance of roadway areas so as not to create air pollution.
3. No person may cause, allow or permit emission of sulfur or sulfur compounds into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. (s. NR 417.03, Wis. Adm. Code).

4. No person may cause, allow or permit organic compound emissions into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. No person may cause, allow or permit organic compounds to be used or handled without using good operating practices and taking reasonable precautions to prevent the spillage, escape or emission of organic compounds, solvents or mixtures. (s. NR 419.03, Wis. Adm. Code).
5. No person may cause, allow or permit the disposal of more than 5.7 liters (1.5 gallons) of any liquid Volatile Organic Compound (VOC) waste, or of any liquid, semisolid or solid waste materials containing more than 5.7 liters (1.5 gallons) of any VOC, in any one day from a facility in a manner that would permit their evaporation into the ambient air during the ozone season. This includes, but is not limited to, the disposal of VOC which must be removed from VOC control devices so as to maintain the control devices at their required operating efficiency. Disposal during the ozone season shall be by methods approved by the Department, such as incineration, recovery for reuse, or transfer in closed containers to an acceptable disposal facility, such that the quantity of VOC which evaporates into the ambient air does not exceed 15% (by weight) or 5.7 liters (1.5 gallons) in any one day, whichever is larger. (s. NR 419.04, Wis. Adm. Code).
6. No person may cause, allow or permit emissions of carbon monoxide to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. (s. NR 426.03, Wis. Adm. Code).
7. No person may cause, allow or permit emissions into the ambient air of lead or lead compounds which substantially contribute to the exceeding of an air standard or air increment, or which create air pollution. (s. NR 427.025, Wis. Adm. Code).
8. No person may cause, allow, or permit nitrogen oxides or nitrogen compounds to be emitted to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. (s. NR 428.03, Wis. Adm. Code).
9. No person may cause, allow or permit emission into the ambient air of any substance or combination of substances in such quantities that an objectionable odor is determined to result unless preventive measures satisfactory to the Department are taken to abate or control such emission. (s. NR 429.03(1), Wis. Adm. Code\*)
10. Open burning is prohibited except as provided in s. NR 429.04, Wis. Adm. Code. (s. NR 429.04, Wis. Adm. Code\*)
11. No person may cause, allow or permit emissions into the ambient air from any direct or portable source in excess of one of the limits specified in ch. NR 431, Wis. Adm. Code. Where the presence of uncombined water is the only reason for failure to meet the requirements of ch. NR 431, Wis. Adm. Code, such failure is not a violation of the chapter. (s. NR 431.03, Wis. Adm. Code)
12. When the department requires instrumentation to monitor the operation of air pollution control equipment, or to monitor source performance, the instrument shall measure operational variables with the following accuracy: (s. NR 439.055(3), Wis. Adm. Code)
  - a. The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or " 5EF of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater.

- b. The pressure drop monitoring device shall be accurate to within 5% of the pressure drop being measured or within " 1 inch of water column, whichever is greater.
  - c. The current, voltage, flow or pH monitoring device shall be accurate to within 5% of the specific variable being measured.
- 13. All instruments used for measuring source or air pollution control equipment operational variables shall be calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. (s. NR 439.055(4), Wis. Adm. Code)
- 14. No person may cause, allow, or permit emissions into the ambient air of any hazardous substance in such quantity, concentration, or duration as to be injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include, but are not limited to, hazardous air contaminants listed in Tables 1 to 5 of s. NR 445.04, Wis. Adm. Code. (s. NR 445.03, Wis. Adm. Code\*).
- 15. Chapter NR 447, Wis. Adm. Code, applies to all air contaminant sources which may emit asbestos, to their owners and operators and to any person whose action causes the emission of asbestos to the ambient air, including demolition and renovation activities. Chapter NR 447, Wis. Adm. Code, establishes emission limitations for asbestos air contaminant sources, establishes procedures to be followed when working with asbestos materials and contains additional reporting and record keeping requirements for owners or operators of asbestos air contaminant sources in order to protect air quality. (ch. NR 447, Wis. Adm. Code)
- 16. **Accidental Release Prevention Requirements**  
  
An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates:
  - a. June 21, 1999;
  - b. Three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or
  - c. The date on which a regulated substance is first present above a threshold quantity in a process.  
(40 CFR 68.10)

**D. Reporting Requirements**

- 1. The Department shall be notified of the following events:

| <u>Event</u>  | <u>Timing</u>   |
|---|---|
| a. Hazardous substance air spill  | Immediate call: 1-800-943-0003  |
| b. Malfunction or other unscheduled event which causes or may cause any emission limitation to be exceeded (except certain visible emission limit exceedences - see s. NR 439.03(4), Wis. Adm. Code.) | Notification by next business day of any such event at the source which is not reported in advance to the Department. Report the cause and duration of the exceedence, the period of time considered necessary for correction, and measures taken to minimize emissions during the period |
| c. Deviation from any other condition   | Notification by next business day identifying the   |

specified in this permit. deviation, cause, duration and steps taken to prevent recurrence.

(ss. 292.11(2) and 285.65(9), Wis. Stats., and ss. NR 439.03(4) and NR 445.08, Wis. Adm. Code)

2. The permittee shall report to the Department, in advance, schedules for planned shutdown and startup of air pollution control equipment and the measures to be taken to minimize the down time of the control equipment while the source is operating. Scheduled maintenance or any other scheduled event, including startup, shutdown or soot blowing procedures which have been approved by the Department under s. NR 436.03(2)(b), which causes an emission limit to be exceeded shall also be reported in advance to the Department. Advance reporting pursuant to this permit condition does not relieve any person from the duty to comply with any applicable emission limitations. Emissions in excess of the limits set in chs. NR 400-499, Wis. Adm. Code, may be allowed when the emissions are temporary and due to scheduled maintenance, startup or shutdown of operations carried out in accord with a plan and schedule approved by the Department. (ss. NR 439.03(2)(b) and (6), Wis. Adm. Code)
3. The permittee shall furnish to the Department, within a reasonable time specified by the Department, any information that the Department may request in writing to determine whether cause exists to revise, revoke or suspend this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Department copies of records required to be kept pursuant to this permit. (s. NR 407.09(1)(f)5., Wis. Adm. Code)
4. The permittee shall submit the results of monitoring required by the permit to the Department according to the schedule established in Part I of this permit. Any such report shall clearly identify all instances of deviations from permit requirements. All such reports shall be signed by the responsible official for the source. In addition, the responsible official shall certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (s. 285.17(2), Wis. Stats., and s. NR 439.03(1)(b) and (10), Wis. Adm. Code)
5. Any document required under this permit and any document submitted to the Department, including reports, shall contain a certification by a responsible corporate official that meets the requirements of s. NR 407.05(4)(j), Wis. Adm. Code. (ss. NR 439.03(10) and (11), and NR 407.09(4)(a)1., Wis. Adm. Code).
6. Except for information determined to be confidential under s. 285.70(2), Wis. Stats., any information or reports obtained by the Department in the administration of ss. 285.01 to 285.87 and 299.15, Wis. Stats., will be available for public inspection at the offices of the Department. (s. 285.70(1), Wis. Stats.)

E. Right of Entry and Inspection

The permittee shall allow authorized representatives of the Department to enter upon the permittee's premises, to have access to and examine any record relating to emissions or required to be kept, and to make any inspection necessary to ascertain compliance with air pollution control laws and the terms of this permit. The Department may, for the purpose of determining a source's compliance with applicable requirements, sample or monitor at reasonable times production materials or other substances or operational parameters. (ss. 285.13 and 285.19, Wis. Stats., and s. NR 439.05, Wis. Adm. Code)



F. Malfunction Prevention and Abatement Plans

The owner or operator of any direct or portable source which may emit hazardous substances or emits more than 15 pounds in any day or 3 pounds in any hour of any air contaminant for which emission limits have been adopted shall prepare a written malfunction prevention and abatement plan to prevent, detect, and correct malfunctions or equipment failures which may cause any applicable emission limitation to be violated or which may cause air pollution. Any such plan shall be carried out by the owner or operator. The plan shall be updated at least every 5 years. The Department may require the plan to be submitted for review and approval. (s. NR 439.11, Wis. Adm. Code)

G. Emission Control Action Plan

For source(s) covered by this permit which emit 0.25 tons or more per day of any air contaminant for which air standards have been adopted, the permittee shall prepare an emission control action program, consistent with good industrial practice and safe operating procedures, for reducing the emission of air contaminants into the outdoor atmosphere during periods of an air pollution alert, air pollution warning or air pollution emergency declared under s. NR 493.03(2), Wis. Adm. Code. The emission control action program shall be in writing, available on the premises and is subject to review and approval by the Department on request. (s. NR 493.04, Wis. Adm. Code\*)

H. Change in Ownership or Control

In the event of a change in ownership or operational control of a source, the permittee shall file a written request for an administrative permit revision in accordance with s. NR 407.11, Wis. Adm. Code. The request should include a written agreement between the current and new owner or operator which sets forth a specific date for transfer of permit responsibility, coverage and liability. If the Department determines that no other change in this permit is necessary, this permit may be revised according to the administrative revision procedures in s. NR 407.11, Wis. Adm. Code. (s. NR 407.11(3)(a), Wis. Adm. Code)

I. Permit Flexibility, Revision, Suspension, and Revocation

1. Changes to the source which are not modifications and changes in permit content are regulated under the permit flexibility provisions of s. 285.60(4m), Wis. Stats., and s. NR 407.025, Wis. Adm. Code, and the permit revision provisions in ss. NR 407.11, NR 407.12, NR 407.13, NR 407.14, and NR 407.16, Wis. Adm. Code.
2. An operation permit may be suspended or revoked, in whole or in part, for cause. (ss. NR 407.09(1)(f)3. and NR 407.15, Wis. Adm. Code.)

J. Construction, Reconstruction, Replacement, Relocation or Modification

1. Unless the replacement is authorized by a permit or is exempt under s. NR 406.04, Wis. Adm. Code, replacement of the source(s) covered by this permit is prohibited. (s. 285.60(1)(a), Wis. Stats.)
2. No person may commence construction, reconstruction, replacement, relocation or modification of a stationary source unless the person has a construction permit for the source or unless the source is exempt from the requirement to obtain a permit under s. 285.60(5), Wis. Stats., or under ch. NR 406, Wis. Adm. Code. Applications for the construction permit shall be submitted on forms which are available from the Department at its Madison headquarters and district offices. (s. 285.60(1)(a), Wis. Stats.)

Note: The address of the Madison headquarters is: Wisconsin Department of Natural Resources, Bureau of Air Management, P. O. Box 7921, Madison, WI 53707, Attention: Permit Application Forms

3. For new or modified sources for which no construction permit is required, the application for an operation permit shall be filed before the source commences construction or modification. (s. NR 407.04, Wis. Adm. Code).

K. Circumvention

1. The installation or use of any article, machine, equipment, process, or method which conceals an emission which would otherwise constitute a violation of an applicable rule is prohibited unless written approval has been obtained from the Department. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance and the unnecessary separation of an operation into parts to avoid coverage by a rule that applies only to operations larger than a specified size. (s. NR 439.10, Wis. Adm. Code)
2. No one may render inaccurate any monitoring device or method required under ch. NR 439, Wis. Adm. Code, or in this permit. (s. NR 439.03(12), Wis. Adm. Code).

L. Civil/Criminal Liability

1. Nothing in this permit shall be construed to relieve the permit holder from civil and/or criminal penalties under ss. 285.87 and 299.15, Wis. Stats., for violation of the terms or conditions of this permit, or for violation of ss. 285.01 to 285.87, 292.11(2) and 299.15, Wis. Stats., or of any rule or any special order issued under those sections except where the operation permit shield provisions of s. 285.62(9)(b), Wis. Stats., are applicable. (s. 285.62(9)(a), Wis. Stats.)
2. The permittee has the duty to comply with all conditions of the permit. Any noncompliance with this permit constitutes a violation of the Wisconsin statutes, the federal clean air act, or both, and is grounds for enforcement action; for permit suspension, revocation or revision; or, if allowed under s. 285.62(6), Wis. Stats., for denial of a permit renewal application. (ss. NR 407.14, NR 407.15, and NR 407.09(1)(f)1., Wis. Adm. Code, s. 285.60(7), Wis. Stats. and 42 USC 7661a)
3. The following items are provided per s. NR 407.09(1)(d) and (f), Wis. Adm. Code:
  - a. It is not a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this permit. (s. NR 407.09(1)(f)2., Wis. Adm. Code)
  - b. The filing of a request by the permittee for a permit revision or revocation, or the filing of a notification of planned changes under s. NR 407.025, Wis. Adm. Code, or of anticipated noncompliance, does not stay any permit condition. (s. NR 407.09(1)(f)3., Wis. Adm. Code)
  - c. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. (s. NR 407.09(1)(f)4., Wis. Adm. Code)
  - d. The provisions of this permit are severable. In the event of a successful challenge to any portion of the permit, all other portions of the permit remain valid and effective. (s. NR 407.09(1)(d), Wis. Adm. Code)

M. Recordkeeping Requirements

1. The permittee shall maintain the following records, per s. NR 439.04, Wis. Adm. Code:
  - a. Records of all sampling, testing and monitoring conducted or required under chs. NR 400 to 499 or under this permit. Records of sampling, testing or monitoring shall include the following:
    - 1) The date, monitoring site and time and duration of sampling, testing, monitoring or measurements.
    - 2) The dates the analyses were performed.
    - 3) The company or entity that performed the analysis.
    - 4) The analytical techniques or methods used, including supporting information such as calibration and maintenance records of all original recording charts for continuous monitoring instrumentation including emissions or equipment monitors.
    - 5) The results of the analyses.
    - 6) The relevant operating conditions that existed at the time of sampling, testing, monitoring or measurement.
  - b. Records detailing all malfunctions which cause any applicable emission limitation to be exceeded, including logs to document the implementation of the plan required under s. NR 439.11, Wis. Adm. Code;
  - c. Records detailing all activities specified in any compliance schedule approved by the Department under chs. NR 400 to 499, Wis. Adm. Code; and
  - d. Any other records relating to the emission of air contaminants which may be requested in writing by the Department.
2. The owner or operator of a source not subject to s. NR 445.05(6), Wis. Adm. Code, shall maintain the following records in writing at the source, as appropriate:
  - a. The hazardous air contaminants in Table 5 of s. NR 445.04 the source is capable of emitting.
  - b. The allowable emissions for each hazardous air contaminant identified in a. above for each emissions unit.
  - c. The methods used to calculate allowable emissions under b. above, including:
    - i. All calculations which show the dimensional units for all values used.
    - ii. Emission factors used and reference to stack tests, mass balance calculations or EPA documents that the emission factor is based on.
  - d. Information to support exemption claims including fuels used, laboratory status or downwash minimization stack height calculations as appropriate. (s. NR 445.05(4r)(c), Wis. Adm. Code\*)
3. Owners and operators of facilities required to file emission inventory reports shall keep accurate and reliable records sufficient to enable verification of the reports by the department. (s. NR 438.03(4), Wis. Adm. Code)
4. Copies of all records and reports required under this permit shall be retained by the permittee for a period of 5 years. (s. NR 439.04(2), Wis. Adm. Code)

N. Compliance Certification

1. The permittee shall submit compliance certifications to the Department, and part 70 sources shall also submit this compliance certification to the United States Environmental Protection Agency. (s. NR 439.03(1)(c) and (9), Wis. Adm. Code)
  - a. The certification shall be submitted according to the schedule established in Part I of the permit. (s. NR 439.03(1)(c), Wis. Adm. Code)
  - b. The certification shall include the following:
    - 1) Identification of each permit term or condition that is the basis of the certification;
    - 2) The compliance status of the source with respect to each term or condition identified in 1);
    - 3) Whether compliance was continuous or intermittent;
    - 4) Method(s) used for determining the compliance status, currently and over the previous 12 month period;
    - 5) Compliance status with respect to 40 CFR 68 (Accidental Release Prevention) including registration and submission of the risk management plan, as specified in 40 CFR 68.160 and 68.150, respectively, if applicable.
    - 6) Other information required to determine the compliance status of the source, as specified in this permit. (s. NR 439.03(8), Wis. Adm. Code)
2. Compliance certifications shall be signed by a responsible official of the source. The responsible official shall certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (s. NR 439.03(10), Wis. Adm. Code)

O. Required Air Emission Inventory Reports

The permittee shall annually submit to the Department an emission inventory report of annual, actual emissions or throughput information in accordance with ch. NR 438, Wis. Adm. Code. (s. NR 438.03, Wis. Adm. Code)

P. Annual Emission Fees

The permittee shall pay an annual emissions fee to the Department at the rate specified in s. 285.69(2), Wis. Stats. (ss. NR 410.04 and NR 407.09(1)(e), Wis. Adm. Code)

Q. General Provisions for Hazardous Air Pollutant MACT Standards

The general provisions in ch. NR 460, Wis. Adm. Code, apply to any permittee that is affected or becomes affected by a standard promulgated by EPA under section 112 of the act (42 USC 7412). (s. NR 460.01, Wis. Adm. Code)

R. Stratospheric Ozone Protection

1. Federal Requirements. (Call 1-800-296-1996 for information)
  - a. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- 1) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to section 82.106.
  - 2) The placement of the required warning statement must comply with the requirements pursuant to section 82.108.
  - 3) The form of the label bearing the required warning statement must comply with the requirements pursuant to section 82.110.
  - 4) No person may modify, remove or interfere with the required warning statement except as described in section 82.112.
- b. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in 40 CFR Part 82, Subpart B:
- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to section 82.156.
  - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to section 82.158.
  - 3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to section 82.161.
  - 4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to section 82.166. (The term, "MVAC-like appliance", is defined in section 82.152)
  - 5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to section 82.156.
  - 6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to section 82.166.
- c. If the permittee manufactures, transforms, imports or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- d. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.
- e. The permittee may be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. (s. 285.65(12), Wis. Stats.)
2. State Requirements. (Call 1-608-264-6049 for information)

- a. During the salvaging, dismantling or transporting of refrigeration equipment, no person may knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into storage tanks. (s. 285.59(2r)(a), Wis. Stats.\*)
- b. No person may knowingly or negligently release from a storage tank to the environment ozone-depleting refrigerant that was removed during the salvaging, dismantling or transporting of refrigeration equipment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into refrigeration equipment or other storage tanks. (s. 285.59(2r)(am), Wis. Stats.\*)
- c. No person may salvage or dismantle any refrigeration equipment unless:
  - 1) That person holds and prominently displays an annual registration of certification obtained from the Department under s. NR 488.04, Wis. Adm. Code;
  - 2) That person uses refrigerant recovery equipment approved by the Department under s. NR 488.07, Wis. Adm. Code, to transfer remaining ozone-depleting refrigerant from each piece of refrigeration equipment into storage tanks; and
  - 3) Individuals who use the approved refrigerant recovery equipment have, or are working under the direct supervision of individuals who have, the qualifications required under s. NR 488.08, Wis. Adm. Code. (s. NR 488.03(3), Wis. Adm. Code\*)
- d. Any person who sells, gives or transports refrigeration equipment to a scrap metal processor shall:
  - 1) Transfer ozone-depleting refrigerant from the refrigeration equipment into a storage tank using approved refrigerant recovery equipment or obtain and possess documentation that another person performed the transfer; and
  - 2) Provide documentation to the scrap metal processor that he or she has complied with 1).

Note: Sample forms for the documentation of compliance with 1) are available from the Bureau of Air Management CFC Program.

EXEMPTION: 1) and 2) do not apply to a person who sells, gives or transports refrigeration equipment to a scrap metal processor when that processor has agreed in writing to transfer the ozone-depleting refrigerant into a storage tank using approved refrigerant recovery equipment and that the processor is registered with the Department under s. NR 488.04. (s. NR 488.05, Wis. Adm. Code\*)

- e. Any person who transports, for the purposes of salvaging or dismantling, refrigeration equipment that contains ozone-depleting refrigerant shall certify to the Department that person will not knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of refrigerant recovery efforts. This certification shall be submitted annually, along with a description of the safe transport methods to be used, and the fees required under s. NR 488.11, Wis. Adm. Code. (s. NR 488.10, Wis. Adm. Code\*)

**PART I**  
**APPLICABLE EMISSION LIMITATIONS AND REQUIREMENTS**

| A. Stack S08 exhausting Boiler B20, a Cleaver Brooks 100 HP Boiler (Norwich Plant) installed in 1969 and rated at 5.2 mmBtu/hr maximum. |  |   |  |
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| Pollutant   | a. Limitations   | b. Compliance Demonstration   | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
| I. Particulate matter emissions (PM and PM-10)  | <p>(1) Particulate matter emissions may not exceed 0.06 pounds per hour from stack S08. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(2) For any boiler which has a maximum heat input that is greater than one million Btu per hour, the permittee may not cause, allow, or permit particulate matter emissions from the stack of such a boiler to exceed</p> <p>E pounds of particulate matter emissions per million Btu heat input,</p> <p>where <math>E = 0.3 - 0.0006 I</math> and <math>I</math> = total maximum heat input for a given boiler in millions of Btu per hour. [ss. NR 415.06(1)(c)1., NR 415.03, NR 404.04(3), and NR 404.04(8), Wis. Adm. Code]</p> | <p>(1) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall only fire natural gas in the boiler. [ss. 285.65(7) Stats., NR 439.04(1)(d), and NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> <p>(3) Within 120 days after issuance of this operation permit the permittee shall determine the maximum heat input capacity for each boiler in terms of millions of Btu per hour, using manufacturer specifications, engineering calculations, empirical testing, or another method approved by the Department. [ss. NR 407.09(4)(b), and NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> <p>(4) Within 120 days after issuance of this operation permit the permittee shall determine the maximum exhaust flow rate and the normal</p> | <p>(1) The permittee shall retain monthly purchase records of the types and amounts of all fuels burned in the boiler. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(2) Within 120 days after issuance of this operation permit the permittee shall generate and maintain records to document the data on maximum heat input capacity, maximum exhaust flow rate, and normal exhaust gas temperature that were determined for this emission unit. [ss. NR 407.09(4)(b), and NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(3) Whenever a stack test for particulate matter emissions is required, the permittee shall use:</p> <p>(a) U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 in 40 CFR Part 60, Appendix A, incorporated by reference in s. NR 484.04, Wis. Adm. Code, for determining particulate matter emissions, and</p> |

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|                      |   | exhaust gas temperature for each boiler stack, using manufacturer specifications, engineering calculations, empirical testing, or another method approved by the Department. [ss. NR 407.09(4)(b), and 407.09(4)(a)3.b., Wis. Adm. Code]  | (b) U.S. EPA Method 202 in 40 CFR Part 51, Appendix M, incorporated by reference in s. NR 484.04, for determining condensable particulate matter emissions. [ss. NR 439.06(1), NR 439.07(8)(n), and NR 407.09(1)(c)1., Wis. Adm. Code]  |
| 2. Visible Emissions | <p>(1) Opacity may not exceed number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2), Wis. Adm. Code]</p> <p>(2) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 5 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day. [s. NR 431.05(1), Wis. Adm. Code]</p> <p>(3) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no</p> | <p>(1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]</p> | <p>(1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> |



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|  | <p>hazard or unsafe conditions arises. [s. NR 431.05(2), Wis. Adm. Code]</p> <p>(4) For direct or portable sources in operation on or before February 1, 1975, where emission test data taken concurrently with opacity readings or continuous emission monitor data show the source to be in compliance with the applicable emission limits but not the opacity limits, an alternative opacity limit may be established according to methods and procedures in s. NR 431.07. [s. NR 431.05(3), Wis. Adm. Code]</p> |  |  |
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| B. Stacks S09 and S44. Stack S09 identifies fugitive emissions in Process P28, a product recovery process (Norwich Plant) installed in 1990. Stack S44 identifies fugitives in Process P44, a brush-on stripper process installed in July, 1995. |   |  |   |
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| Pollutant  | a. Limitations  | b. Compliance Demonstration  | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements   |
| 1. Volatile Organic Compounds (VOC)  | (1) The permittee may not exceed 6.8 kilograms (15 pounds) of volatile organic compounds in any day from all other process lines. [ss. 265.05(7), State Stat. and s. NR 424.03(1), Wis. Adm. Code]  | (1) The permittee shall keep records adequate to support the exemption. [ss. NR 407.09(1)(c)2. and NR 439.04(3), Wis. Adm. Code] | (1) Records adequate to support the exemption shall include, but not be limited to:<br><br>(a) a unique name or identification number for each raw material,<br>(b) the volume of raw material used per day in units of gallons,<br>(c) the VOC content of each raw material in units of pounds of VOC per gallon, and<br>(d) the total amount of VOC emitted in units of pounds per day. [ss. NR 407.09(1)(c)2. and NR 439.04(3), Wis. Adm. Code]<br><br>(2) Whenever required by the Department, the permittee shall use Method 18, 25, 25A, or 25B in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, to determine organic compound emission concentrations or emission rates. Method 24 or 24A in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, shall be used to determine the organic solvent content, the volume of solids, the weight of solids, the water content, and the density of surface coatings and inks. [s. NR 439.06(3)(a) and (b), Wis. Adm. Code] |
| 2. Volatile organic compounds (LACT conditions)  | (1) Each process line constructed or modified after August 1, 1979 and not meeting the above exemption level, must control volatile organic compounds by 85% overall or the facility must apply the | (1) The permittee shall submit periodic progress reports. [s. NR 407.09(1)(c)3., Wis. Adm. Code]                                 | (1) The permittee shall demonstrate the facility's compliance with s. NR 424.03(2), Wis. Adm. Code, within 18 months of the date of the issuance of this permit. Quarterly progress reports shall be submitted to the Department detailing the efforts and upcoming plans made in demonstrating compliance with the regulation. These reports shall be submitted  |

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|  | <p>Latest Available Control Techniques and operating practices (LACT).<br/>[s. NR 424.03(2), Wis. Adm. Code]</p> <p>(2) Control for this process is to be determined following submittal of the analysis required in s. NR 424.03(2), Wis. Adm. Code.</p> | <p>according to the dates outlined below. These progress reports should summarize all of the actions and the dates that these actions were taken towards demonstrating compliance over the past quarter. The reports should also present the expected actions that will be undertaken in each upcoming quarter.</p> <p>(a) First quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(b) Second quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(c) Third quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(d) Fourth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(e) Fifth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(f) Sixth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance; and</p> <p>(g) As a supplement to the final progress report, the permittee shall submit an analysis and additional documents (e.g., stack blueprints, control device documentation, emission calculations) as necessary, to the Department demonstrating that the facility is in compliance with the regulation.</p> <p>(2) Included in the final submittal shall be an operation permit revision request containing proposed</p> |
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|  |  |  | emission limits, compliance demonstration methods, and monitoring, recordkeeping and testing requirements. |
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| C. Stack S10 exhausting Process P30, a reclamation furnace (Norwich Plant) installed in June, 1976 and rated at 16.0 mmBtu/hr maximum. |  |   |  |
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| Pollutant  | a. Limitations   | b. Compliance Demonstration   | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
| 1. Particulate matter emissions (PM and PM-10)   | (1) Particulate matter emissions may not exceed 2.41 pounds per hour from stack S10. [s. NR 404.08(2), Wis. Adm. Code]   | (1) Only natural gas or liquid propane shall be used as combustion fuel. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code.]<br><br>(2) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code] | (1) Whenever particulate matter emission testing is required by the Department, compliance with the particulate matter emission limit shall be determined by U.S. EPA, Method 5 and 202. [s. NR 439.06(1), Wis. Adm. Code]<br><br>(2) The permittee shall keep weekly records of which type of fuel was used. [s. NR 439.04(1)(d), Wis. Adm. Code]   |
| 2. Volatile Organic Compounds (VOC)  | (1) The permittee may not exceed 6.8 kilograms (15 pounds) of volatile organic compounds in any day from these process lines. [ss. 265.05(7), State Stat. and s. NR 424.03(1), Wis. Adm. Code] | (1) The permittee shall keep records adequate to support the exemption. [ss. NR 407.09(1)(c)2. and NR 439.04(3), Wis. Adm. Code]  | (1) Records adequate to support the exemption shall include, but not be limited to:<br><br>(a) a unique name or identification number for each raw material,<br>(b) the volume of raw material used per day in units of gallons,<br>(c) the VOC content of each raw material in units of pounds of VOC per gallon, and<br>(d) the total amount of VOC emitted in units of pounds per day. [ss. NR 407.09(1)(c)2. and NR 439.04(3), Wis. Adm. Code]<br><br>(2) Whenever required by the Department, the permittee shall use |

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|                      |   |  | Method 18, 25, 25A, or 25B in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, to determine organic compound emission concentrations or emission rates. Method 24 or 24A in 40 CFR part 60, Appendix A, incorporated by reference in s. NR 484.04, shall be used to determine the organic solvent content, the volume of solids, the weight of solids, the water content, and the density of surface coatings and inks. [s. NR 439.06(3)(a) and (b), Wis. Adm. Code]   |
| 3. Visible Emissions | (1) Visible emissions may not exceed 20 percent opacity. [s. NR 431.05, Wis. Adm. Code] | (1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]<br><br>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code] | (1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]<br><br>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR |

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|  |  |  | 407.09(1)(c)1.b., Wis.<br>Adm. Code] |
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| D. Stack S11 exhausting Process P31, a shot blaster (Norwich Plant) installed in August, 1974. |   |   |   |
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| Pollutant  | a. Limitations  | b. Compliance Demonstration   | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements   |
| 1. Particulate matter emissions (PM and PM-10)   | (1) Particulate matter emissions may not exceed 0.326 pounds per hour from stack S11 while exhausting P31 alone. [s. NR 404.08(2), Wis. Adm. Code]  | (1) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]   | (1) Whenever particulate matter emission testing is required, the permittee shall use U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensable backhalf emissions (U.S. EPA Method 202). [s. NR 439.075, Wis. Adm. Code]   |
| 2. Visible Emissions   | <p>(1) Opacity may not exceed number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2), Wis. Adm. Code]</p> <p>(2) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 5 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day. [s. NR 431.05(1), Wis. Adm. Code]</p> <p>(3) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no</p> | <p>(1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]</p> | <p>(1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> |



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|  | <p>hazard or unsafe conditions arises. [s. NR 431.05(2), Wis. Adm. Code]</p> <p>(4) For direct or portable sources in operation on or before February 1, 1975, where emission test data taken concurrently with opacity readings or continuous emission monitor data show the source to be in compliance with the applicable emission limits but not the opacity limits, an alternative opacity limit may be established according to methods and procedures in s. NR 431.07. [s. NR 431.05(3), Wis. Adm. Code]</p> |  |  |
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| E. Stacks S11 and S54 exhausting Process P54, a small shot blaster installed in January, 1959. |  |  |  |
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| Pollutant  | a. Limitations   | b. Compliance Demonstration  | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
| 1. Particulate matter emissions (PM and PM-10)   | (1) Particulate matter emissions may not exceed 0.006 pounds per hour from stack S54 while exhausting P54 alone. [s. NR 404.08(2), Wis. Adm. Code]   | (1) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]  | (1) Whenever particulate matter emission testing is required, the permittee shall use U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensable backhalf emissions (U.S. EPA Method 202). [s. NR 439.075, Wis. Adm. Code]  |
| 2. Visible Emissions   | (1) No owner or operator of a direct or portable source on which construction or modification is commenced after April 1, 1972 may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code] | (1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]<br><br>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code] | (1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]<br><br>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] |

| <p>F. Stacks S12, S12A, S12B and S12C (Norwich Plant) exhausting Process P32, an interior lining process installed in June, 1977 whose curing oven is rated at 4.55 mmBtu/hr maximum and controlled by waterwash particulate filter.</p> <p>Stacks S12, S12A, S12B and S12C exhausting Process P33, a lid lining process installed in June, 1977 and controlled by a waterwash particulate filter.</p> <p>Stacks S12 and S55 (Norwich Plant) exhausting Process P34, a exterior coating process installed in June, 1977 and controlled by a waterwash particulate filter.</p> <p>Stack S13 (Norwich Plant) exhausting Process P35, a special colors paint booth installed in 1980 and controlled by a dry particulate filter.</p> |  |  |  |
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| Pollutant   | a. Limitations   | b. Compliance Demonstration  | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
| 1. Particulate matter emissions (PM and PM-10)  | <p>(1) Particulate matter emissions may not exceed 1.327 pounds per hour from stack S12. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(2) Particulate matter emissions may not exceed 0.018 pounds per hour from stack S12A. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(3) Particulate matter emissions may not exceed 0.018 pounds per hour from stack S12B. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(4) Particulate matter emissions may not exceed 0.018 pounds per hour from stack S12C. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(5) Particulate matter emissions may not exceed 0.25 pounds per hour from stack S13. [s. NR 404.08(2),</p> | <p>(1) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall use the filter/scrubber system to control emissions at all times the process is in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]</p> | <p>(1) Whenever particulate matter emission testing is required, the permittee shall use U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensable backhalf emissions (U.S. EPA Method 202). [s. NR 439.075, Wis. Adm. Code]</p> |

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|                               | Wis. Adm. Code]   |  |  |
|                               | (6) Particulate matter emissions may not exceed 0.012 pounds per hour from stack S55 while exhausting P34. [s. NR 404.08(2), Wis. Adm. Code]  |  |  |
| 2. Visible Emissions          | (1) Visible emissions may not exceed 20 percent opacity. [s. NR 431.05, Wis. Adm. Code]   | (1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]<br><br>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code] | (1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]<br><br>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] |
| 3. Volatile Organic Compounds | (1) The permittee may not cause, allow, or permit the emission of any VOCs in excess of 3.5 pounds per gallon (0.42 kilograms per liter) of coating, excluding water, delivered to a coating applicator that applies air-dried coatings that are not clear coatings. [ss. NR 422.15(3)(c), NR | (1) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, ink, thinner and cleanup solvent, to demonstrate compliance with VOC content limits. The documents shall contain  | (1) Whenever the organic solvent content, the volume of solids, the weight of solids, the water content and the density of surface coatings and inks is required, the permittee shall use U.S. EPA Method 24 or 24A. [s. NR 439.06(3)(b), Wis. Adm. Code]  |

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|   | 424.03(1)(b), and NR 424.03(2), Wis. Adm. Code]   | sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] | <p>(2) The permittee shall keep the following records:</p> <p>(a) A unique name or identification number for each coating, as applied;</p> <p>(b) A unique name or identification number for each coating, clean-up solvent and thinner, as received;</p> <p>(c) The VOC content of each coating, as applied, in units of pounds VOC per gallon, excluding water and</p> <p>(d) The VOC content of each coating, thinner and clean-up solvent, as received. [s. NR 439.04(5)(a), Wis. Adm. Code]</p> <p>(3) The permittee shall keep the following records:</p> <p>(a) A unique name or identification number for each noncompliant coating, as applied.</p> <p>(b) The quantity of each noncompliant coating applied during each month, in gallons.</p> <p>(c) The total quantity of all noncompliant coatings applied during each month, in gallons.</p> <p>(d) The total quantity of all</p> |
| 4. Volatile Organic Emissions under Internal Offset | (1) The department has, by order of August 10, 1987 issued under s. 285.13(2), Stats., approved | (1) The permittee shall keep records adequate to determine compliance and consistent with s.   | (1) Whenever VOC content compliance testing is required, USEPA Method 24A shall be used.  |

| <p>permittee's application made for an internal offset for Processes P32, P33, P34 and P35 on condition that:</p> <p>(a) VOC emissions from each process shall not exceed the pound per day (PPD) limits specified below:</p> <table><tr><th>Process</th><th>Limit (PPD)</th></tr><tr><td>P34</td><td>2258.4</td></tr><tr><td>P33</td><td>116.0</td></tr><tr><td>P32</td><td>405.9</td></tr><tr><td>P35</td><td>836.6</td></tr></table> <p>(b) The combined daily emission rate of volatile organic compounds (VOCs) from all four processes shall be less than or equal to an emission rate determined by the following equation:</p> $E = S \{(A_i \times B_i \times C_i) / D_i\}$ <p>where:</p> <p>E = total allowable emissions of VOCs from these processes, in pounds per day</p> <p>S = the sum of each quantity of (A x B x C)/D for each paint</p> | Process     | Limit (PPD) | P34 | 2258.4 | P33 | 116.0 | P32 | 405.9 | P35 | 836.6 | <p>NR 439.04, Wis. Adm. Code, specifically, the records should enable the Department to make a positive compliance determination whether the four subject processes are in compliance with their limits individually, and in total. [s. NR 425.05(2)(b)3., Wis. Adm. Code]</p> | <p>[s. NR 439.06(3)(b), Wis. Adm. Code]</p> <p>(2) The following records shall be maintained:</p> <p>(a) For each coating/ink, as applied:</p> <ul style="list-style-type: none"><li>i) The process line at which it was applied [s. NR 439.04(1)(d), Wis. Adm. Code];</li><li>ii) Fraction of VOCs, by volume [s. NR 439.04(1)(d), Wis. Adm. Code];</li><li>iii) Fraction of solids, as defined in equation variable Ci, by volume [s. NR 439.04(5)(f)2., Wis. Adm. Code];</li><li>iv) Fraction of water, by volume (if applicable) [s. NR 439.04(1)(d), Wis. Adm. Code];</li><li>v) The VOC density, as defined in equation variable Pi, in pounds VOC per gallon VOC [s. NR 439.04(5)(f)3., Wis. Adm. Code];</li><li>vi) The applicable emission limit as defined in equation variable Ai [s. NR 439.04(1)(d), Wis. Adm. Code];</li><li>vii) Volume of each coating delivered, as defined in equation variable Bi, in gallons per day. [s. NR 439.04(5)(f)1., Wis. Adm. Code];</li></ul> <p>(b) The daily actual VOC emissions</p> |
|---|-------------|-------------|-----|--------|-----|-------|-----|-------|-----|-------|--|---|
| Process   | Limit (PPD) |             |     |        |     |       |     |       |     |       |  |   |
| P34   | 2258.4      |             |     |        |     |       |     |       |     |       |  |   |
| P33   | 116.0       |             |     |        |     |       |     |       |     |       |  |   |
| P32   | 405.9       |             |     |        |     |       |     |       |     |       |  |   |
| P35   | 836.6       |             |     |        |     |       |     |       |     |       |  |   |

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|  | Ai = the allowable emission rate for each coating/printing line pursuant to s. NR 422.15(2)(c) and (3)(c), Wis. Adm. Code, in pounds per gallon, excluding water, delivered |  | for each coating, each coating line and the combined emissions for all lines, in lb/day. [s. NR 439.04(1)(d), Wis. |
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G. Stacks S14 and S56 (Penn. Plant) exhausting Process P36, a small drum coating booth and gas-fired oven rated at 1.0 mmBtu/hr maximum and installed in 1981 and controlled by a dry filter.

| Pollutant                                      | a. Limitations  | b. Compliance Demonstration   | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
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| 1. Particulate matter emissions (PM and PM-10) | <p>(1) Particulate matter emissions may not exceed 0.149 pounds per hour from stack S14. [s. NR 404.08(2), Wis. Adm. Code]</p> <p>(2) Particulate matter emissions may not exceed 0.012 pounds per hour from stack S56. [s. NR 404.08(2), Wis. Adm. Code]</p> | <p>(1) Whenever requested by the Department, the permittee shall perform particulate matter emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall use the filter/scrubber system to control emissions at all times the process is in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]</p> <p>(3) The permittee shall inspect the overspray filters prior to initial use of the spray booth each day the spray booth is used. This inspection shall include checking for correct filter placement, condition (absence of rips or tears), and signs of excessive loading. [s. NR 407.09(4)(a)1., Wis. Adm. Code]</p> <p>(4) The permittee shall clean or change the overspray filters based on the results of the required periodic inspections required. [s. NR 407.09(4)(a)1., Wis. Adm. Code]</p> | <p>(1) Whenever particulate matter emission testing is required, the permittee shall use U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 including condensable backhalf emissions (U.S. EPA Method 202). [s. NR 439.075, Wis. Adm. Code]</p> <p>(2) The permittee shall keep records of the dates that the spray booth filters are cleaned, changed or other routine maintenance is performed. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(3) The permittee shall measure and record the pressure drop across the overspray filters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements. [s. NR 439.055(6), Wis. Adm. Code]</p> |



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|                               |  | (5) The permittee shall maintain the pressure drop across the overspray filters between the pressure drop range in inches of water column recommended by the manufacturer or at a range approved by the Department. [ss. NR 407.09(4)(a)1., and 439.055(6), Wis. Adm. Code]   |   |
| 2. Visible Emissions          | (1) Visible emissions may not exceed 20 percent opacity. [s. NR 431.05, Wis. Adm. Code]  | <p>(1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]</p> | <p>(1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> |
| 3. Volatile Organic Compounds | (1) Emissions may not exceed 3.5 pounds VOC per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [ss. NR 422.15(2)(b), Wis. Adm. Code] | (1) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, thinner and cleanup solvent, to demonstrate  | <p>(1) For any coating line, the permittee shall keep the following records on a daily basis:</p> <p>(a) A unique name or identification number for each coating, as applied;</p>   |

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|  |  | <p>compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> <p>(2) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating applicator as follows:</p> $VOC_a = [(VOC_c \times Q_c) + (VOC_t \times Q_t)] / (Q_c + Q_t)$ <p>where:</p> <p>VOC<sub>a</sub> = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water;</p> <p>VOC<sub>c</sub> = the VOC content of the coating as received, in pounds per gallon, excluding water;</p> <p>Q<sub>c</sub> = the amount of coating as received that mixed with thinner prior to application, in gallons;</p> <p>VOC<sub>t</sub> = the VOC content of the thinner as received, in pounds per</p> | <p>(b) A unique name or identification number for each coating, clean-up solvent and thinner, as received</p> <p>(c) The VOC content of each coating, as applied, in units of pounds VOC per gallon, excluding water; and</p> <p>(d) The VOC content of each coating, thinner and clean-up solvent, as received.</p> <p>[s. NR 439.04(5)(a), Wis. Adm. Code]</p> |
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|  |  | gallon, excluding water;<br>Qt = the amount of<br>thinner added to the<br>amount of coating (Qc)<br>above. [s. NR<br>407.09(4)(a)3.b., Wis.<br>Adm. Code] |  |
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| H. Stack S21 (Penn. Plant) exhausting Process P41, a caustic paint softener installed in July, 1995 and controlled with a wet scrubber. |  |  |  |
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| Pollutant   | a. Limitations   | b. Compliance Demonstration  | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
| 1. Particulate matter emissions (PM and PM-10)  | (1) Particulate matter emissions may not exceed 0.11 pounds per hour from stack S21 when exhausting P41 alone. [s. NR 404.08(2), Wis. Adm. Code] | <p>(1) The permittee shall use the wet scrubber to control emissions at all times the process is in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall maintain:</p> <p>(a) the pressure drop across the scrubber and demister between the pressure drop range in inches of water column recommended by the manufacturer or at a range approved by the Department;</p> <p>(b) the liquor flow rate through the scrubber at the flow rate in gallons per minute recommended by the manufacturer or at a rate approved by the Department. [ss. NR 407.09(4)(a)1., and 439.055(1)(e), Wis. Adm. Code]</p> <p>(3) The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/ repair (as necessary) of:</p> | <p>(1) Recordkeeping and monitoring are not required for any applicable requirement where the facility does not have the potential to violate the emission limitations under normal operating conditions. [ss. 285.65(3) and 285.63(4)(b), Stats.]</p> <p>(2) Whenever a stack test for particulate matter emissions is required, the permittee shall use:</p> <p>(a) U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 in 40 CFR Part 60, Appendix A, incorporated by reference in s. NR 484.04, Wis. Adm. Code, for determining particulate matter emissions and</p> <p>(b) U.S. EPA Method 202 in 40 CFR Part 51, Appendix M, incorporated by reference in s. NR 484.04, for determining condensable particulate matter emissions. [ss. NR 439.06(1), NR 439.07(8)(n), and NR 407.09(1)(c)1., Wis. Adm. Code]</p> <p>(3) The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the</p> |

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|                      |   | <p>(a) the spray nozzle(s) for signs of corrosion and plugging;</p> <p>(b) inlet and outlet ducts for plugging and leaks;</p> <p>(c) the pumping system, suction pipe, and pumping system valves and</p> <p>(d) the mist eliminator for signs of corrosion and plugging. [s. NR 407.09(4)(a)1., Wis. Adm. Code]</p>                           | <p>greater number of measurements:</p> <p>(a) the pressure drop across the scrubber and demister;</p> <p>(b) the liquor flow rate through the scrubber. [s. NR 439.055(2)(b), Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of:</p> <p>(a) the date, time, and initials of the person performing the required periodic inspections;</p> <p>(b) a list of the items inspected; and</p> <p>(c) any maintenance or repairs performed as a result of</p>  |
| 2. Visible Emissions | <p>(1) Opacity may not exceed number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.04(2), Wis. Adm. Code]</p> <p>(2) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80 % opacity for 5 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day. [s. NR 431.05(1), Wis. Adm. Code]</p> <p>(3) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency</p> | <p>(1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]</p> | <p>(1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> |

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|  | <p>equipment, or other good cause, provided no hazard or unsafe conditions arises. [s. NR 431.05(2), Wis. Adm. Code]</p> <p>(4) For direct or portable sources in operation on or before February 1, 1975, where emission test data taken concurrently with opacity readings or continuous emission monitor data show the source to be in compliance with the applicable emission limits but not the opacity limits, an alternative opacity limit may be established according to methods and procedures in s. NR 431.07. [s. NR 431.05(3), Wis. Adm. Code]</p> |  |   |
| <p>3. Sodium Hydroxide (NaOH)</p> <p>Note: Also see HAP modeling in General Conditions</p> | <p>(1) Ambient air concentration off property shall not exceed ten percent of the threshold limit value - ceiling established by the American conference of governmental industrial hygienists in the indices for 1990 - 1991, incorporated by reference in s. NR 484.11, for any one-hour averaging period. [s. NR 445.05(1) and (4), Wis. Adm. Code] *</p>  | <p>(1) Whenever requested by the Department, the permittee shall perform sodium hydroxide emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> | <p>(1) Whenever compliance emissions testing is required, the owner or operator of this facility shall use methods and plans approved in writing by the Department to determine compliance with the NaOH limitation. [s. NR 439.06(8), Wis. Adm. Code] *</p> <p>(2) Whenever compliance testing is required, the permittee shall use NIOSH Method 7401 or OSHA Method ID121 to determine sodium hydroxide emissions. [s. NR 439.06(8), Wis. Adm. Code] *</p> <p>(3) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the physical stack parameters. [s. NR</p> |

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|  |  |  | 439.04 (1) (d), Wis. Adm.<br>Code] |
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I. Stacks S21, S62, S63, S64 and S65 (Penn. Plant) exhausting Process P42, an internal wash and deruster process consisting of preflush, wash water holding tank, HCl holding tank, water rinse, caustic holding tank and neutralizer rated at 4.5 mmBtu/hr maximum installed in July, 1995 and controlled with a wet scrubber.

Stacks S50, S51, S52 and S53 (Norwich Plant) exhausting Process P50, a pre-flush, caustic wash holding tank and gas fired dryer installed at an unknown date whose dryer is rated at 0.75 mmBtu/hr maximum.

Stacks S57, S58 and S59 (Penn. Plant) exhausting Process P60, a new pre-flush caustic wash holding tank and gas-fired dryer rated at 1.3 mmBtu/hr maximum and installed in January, 1995.

Stacks S21, S60, S61 and S66 (Penn. Plant) exhausting Process P80, a pre-flush, caustic wash holding tank and gas-fired dryer installed at an unknown date and rated at 4.45 mmBtu/hr maximum.

Stacks S21, S67, S68 and S69 (Penn. Plant) exhausting Process P90, Tote caustic wash and gas-fired dryer installed at an unknown date and rated at 6.0 mmBtu/hr maximum.

| Pollutant                                      | a. Limitations  | b. Compliance Demonstration   | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements  |
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| 1. Particulate matter emissions (PM and PM-10) | (1) Particulate matter emissions may not exceed 0.024 pounds per hour from stack S21. [s. NR 404.08(2), Wis. Adm. Code] | <p>(1) The permittee shall use good operating practices and take reasonable precautions to prevent emissions of particulate matter. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> <p>(2) The permittee shall use the wet scrubber to control emissions at all times the process is in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]</p> <p>(3) The permittee shall maintain:</p> <p>(a) the pressure drop across the scrubber and demister between the pressure drop range in inches of water column recommended by the manufacturer or at</p> | <p>(1) Recordkeeping and monitoring are not required for any applicable requirement where the facility does not have the potential to violate the emission limitations under normal operating conditions. [ss. 285.65(3) and 285.63(4)(b), Stats.]</p> <p>(2) Whenever a stack test for particulate matter emissions is required, the permittee shall use</p> <p>(a) U.S. EPA Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H or 17 in 40 CFR Part 60, Appendix A, incorporated by reference in s. NR 484.04, Wis. Adm. Code, for determining particulate matter emissions.</p> |



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|                      |   | <p>range approved by the Department;</p> <p>(b) the liquor flow rate through the scrubber at the flow rate in gallons per minute recommended by the manufacturer or at a rate approved by the Department. [ss. NR 407.09(4)(a)1., and 439.055(1)(e), Wis. Adm. Code]</p> <p>(4) The permittee shall perform periodic internal inspections of the wet scrubber to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. These inspections shall include, but not be limited to inspections and maintenance/repair (as necessary) of:</p> <p>(a) the spray nozzle(s) for signs of corrosion and plugging;</p> <p>(b) inlet and outlet ducts for plugging and leaks;</p> <p>(c) the pumping system, suction pipe, and pumping system valves and</p> | <p>and</p> <p>(b) U.S. EPA Method 202 in 40 CFR Part 51, Appendix M, incorporated by reference in s. NR 484.04, for determining condensable particulate matter emissions. [ss. NR 439.06(1), NR 439.07(8)(n), and NR 407.09(1)(c)1., Wis. Adm. Code]</p> <p>(3) The permittee shall measure and record the following parameters once for every 8 hours of source operation or once per day, whichever yields the greater number of measurements:</p> <p>(a) the pressure drop across the scrubber and demister;</p> <p>(b) the liquor flow rate through the scrubber. [s. NR 439.055(2)(b), Wis. Adm. Code]</p> <p>(4) The permittee shall keep records of:</p> <p>(a) the date, time, and initials of the person performing the required periodic inspections;</p> <p>(b) a list of the items inspected; and</p> <p>(c) any maintenance or repairs performed as a result of</p> |
| 2. Visible Emissions | <p>(1) Opacity may not exceed number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p> <p>(2) Opacity may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by</p> | <p>(1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall</p>  | <p>(1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an</p>   |

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|   | the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or unsafe conditions arises. [s. NR 431.05(2), Wis. Adm. Code]   | also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]                               | alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]<br><br>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]   |
| 3. Sodium Hydroxide (NaOH)<br><br>Note: Also see HAP modeling in General Conditions | (1) Ambient air concentration off property shall not exceed ten percent of the threshold limit value - ceiling established by the American conference of governmental industrial hygienists in the indices for 1990 - 1991, incorporated by reference in s. NR 484.11, for any one-hour averaging period. [s. NR 445.05(1) and (4), Wis. Adm. Code] * | (1) Whenever requested by the Department, the permittee shall perform sodium hydroxide emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code] | (1) Whenever compliance emissions testing is required, the owner or operator of this facility shall use methods and plans approved in writing by the Department to determine compliance with the NaOH limitation. [s. NR 439.06(8), Wis. Adm. Code] *<br><br>(2) Whenever compliance testing is required, the permittee shall use NIOSH Method 7401 or OSHA Method ID121 to determine sodium hydroxide emissions. [s. NR 439.06(8), Wis. Adm. Code] *<br><br>(3) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the physical stack parameters. [s. NR 439.04(1)(d), Wis. Adm. Code] |

J. Stacks S22 and S70 (Penn. Plant) exhausting Process P43, a paint booth with curing oven rated at 5.0 mmBtu/hr maximum installed July, 1995 and controlled with a dry filter.

| Pollutant                                    | a. Limitations   | b. Compliance Demonstration  | c. Reference Test Methods, Recordkeeping, and Monitoring Requirements   |
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| 1. Volatile Organic Compound (VOC) Emissions | (1) Emissions may not exceed 3.5 pounds VOC per gallon of coating applied, excluding water, for extreme performance cured coatings delivered to an applicator. [ss. NR 422.15(2)(b), Wis. Adm. Code] | <p>(1) The permittee may use USEPA Method 24 results, Material Safety Data Sheets, or an equivalent document provided by the supplier for each coating, thinner and cleanup solvent, to demonstrate compliance with VOC content limits. The documents shall contain sufficient information to calculate the VOC content in the units necessary to determine compliance. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> <p>(2) If coatings as received are thinned prior to use, the permittee shall calculate the VOC content of the coating as delivered to each coating applicator as follows:</p> $\text{VOCa} = [(\text{VOCc} \times \text{Qc}) + (\text{VOCt} \times \text{Qt})] / (\text{Qc} + \text{Qt})$ <p>where:</p> <p>VOCa = the VOC content of the coating as delivered to the coating applicator, in pounds per gallon excluding water;</p> <p>VOCc = the VOC content of the</p> | <p>(1) For any coating line, the permittee shall keep the following records on a daily basis:</p> <p>(a) A unique name or identification number for each coating, as applied;</p> <p>(b) A unique name or identification number for each coating, clean-up solvent and thinner, as received;</p> <p>(c) The VOC content of each coating, as applied, in units of pounds VOC per gallon, excluding water and</p> <p>(d) The VOC content of each coating, thinner and clean-up solvent, as received. [s. NR 439.04(5)(a), Wis. Adm. Code]</p> |

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|  |   | coating as received, in pounds per gallon, excluding water;<br>Qc = the amount of coating as received that mixed with thinner prior to application, in gallons;<br>VOct = the VOC content of the thinner as received, in pounds per gallon, excluding water;<br>Qt = the amount of thinner added to the amount of coating (Qc) above.<br>[s. NR 407.09(4)(a)3.b., Wis. Adm. Code] |  |
| 2. Visible Emissions                           | (1) No owner or operator of a direct or portable source on which construction or modification is commenced after April 1, 1972 may cause or allow emissions of shade or density greater than number 1 of the Ringlemann chart or 20% opacity.<br>[s. NR 431.05, Wis. Adm. Code] | (1) Whenever requested by the Department, the permittee shall perform visible emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]<br><br>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for visible emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]  | (1) Whenever visible emission testing is required by the Department, compliance with the visible emissions limit shall be determined by U.S. EPA Method 9 or the methods listed in s. NR 439.06, Wis. Adm. Code to determine compliance with emission limitations unless an alternative or equivalent method is approved in writing by the Department. [ss. NR 407.09(1)(c)1.a. and 439.06(9)(a)1., Wis. Adm. Code]<br><br>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the visible emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code] |
| 3. Particulate matter emissions (PM and PM-10) | (1) Particulate matter emissions may not exceed 0.09 pounds per hour from stack S22. [s. NR 404.08(2),  | (1) The permittee shall use the filter/scrubber systems to control emissions at all times the process is  | (1) The permittee shall keep records of the date, time, and description of all inspections of all  |

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|                                      | <p>Wis. Adm. Code]</p> <p>(2) Particulate matter emissions may not exceed 0.06 pounds per hour from stack S70. [s. NR 404.08(2), Wis. Adm. Code]</p>  | <p>in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]</p> <p>(2) Once daily, the permittee shall replace all filters used. [NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> <p>(3) The permittee shall perform a weekly inspection of all filters, and based on this inspection the permittee shall perform any maintenance recommended by the manufacturer and any maintenance that seems prudent according to permittee knowledge of this process and control device. [NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> | <p>filters, any maintenance of scrubbers, and all replacements of the filters. [s. NR 439.04(1)(d), Wis. Adm. Code]</p> <p>(2) Whenever particulate matter testing is required by the department, the owner or operator of a source shall use Method 5, 5A, 5B, 5D, 5E, 5F, 5G, 5H, 5I or 17 in 40 CFR part 60, Appendix A, and when required, Method 202 in 40 CFR part 51, Appendix M. [s. NR 439.06(1), Wis. Adm. Code]</p>                                      |
| 4. Lead and Lead Compounds Emissions | <p>(1) The permittee may not cause, allow, or permit emissions of lead and lead compounds, measured as elemental lead as a constituent of suspended particulate matter, in such quantity or duration as to cause ambient air concentrations off the source property which exceed 1.5 micrograms per cubic meter, as averaged over a calendar quarter as a maximum arithmetic mean. [s. NR 404.04(7), NR 427.03, and NR 427.025, Wis. Adm. Code]</p> | <p>(1) Whenever requested by the Department, the permittee shall perform lead emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The compliance demonstration requirements for particulate matter shall also serve as a compliance demonstration method for lead emissions. [s. NR 407.09(1)(c)1.a., Wis. Adm. Code]</p>  | <p>(1) Whenever compliance emissions testing is required, the owner or operator of this facility shall use methods and plans approved in writing by the Department to determine compliance with the above limitation. [s. NR 439.06(8), Wis. Adm. Code] *</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve to demonstrate compliance with the lead emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> |
| 5. Emissions of                      | (1) Ambient air concentration off   | (1) Whenever requested by the  | (1) Whenever compliance   |

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| <p>a) Chromium (VI) compounds, as Cr, water soluble, including chromic acid mists and dissolved Cr (VI) aerosols (Table 1, ch. NR 445, Wis. Adm. Code)</p> <p>b) Chromium (VI) compounds, as Cr, water insoluble, including particulates (Table 3)</p> <p>c) Chromium metal and compounds other than Chromium (VI) compounds (Table 4)</p> <p>Note: Also see HAP modeling in General Conditions</p> | <p>property of Table 1 substances shall not exceed ten percent of the threshold limit value - time weighted average established by the American conference of governmental industrial hygienists in the indices for 1987 - 1988, incorporated by reference in s. NR 484.11 for any one-hour averaging period. [s. NR 445.05(1)(b), Wis. Adm. Code] *</p> <p>(2) Ambient air concentration of property of Table 4 substances shall not exceed ten percent of the threshold limit value - time weighted average established by the American conference of governmental industrial hygienists in the indices for 1990 - 1991, incorporated by reference in s. NR 484.11 for any one-hour averaging period. [s. NR 445.05(4)(b), Wis. Adm. Code] *</p> <p>[s. 285.65(7), Stats.]</p> <p>*(3) If the total annual water insoluble chromium (VI) compound emissions exceed 2.0 pounds per year or if their monthly average emissions exceed 0.166 pounds then the facility must propose lowest achievable emission rate technology (LAER) to achieve compliance. [Table 3A, ch. NR 445 and s. NR 445.04(3)(a), Wis. Adm. Code]</p> | <p>Department, the permittee shall perform chromium compound emission testing. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall determine the total chromium and chromium compounds content, converted to the same dimensional units as for VOC content. To make this determination the permittee shall use the manufacturers certified compositional analysis or certified product specifications for each material. For each material the permittee shall include all chemical species in the calculation of total chromium and chromium compounds content that can be categorized under any of the types of chromium pollutants. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] *</p> <p>(3) If chromium or chromium compounds were present in coatings used during any calendar month, then within fifteen (15) days after the end of each calendar month in which chromium-containing compounds were used, the permittee shall calculate the actual emissions</p> | <p>emissions testing is required, the owner or operator of this facility shall use methods and plans approved in writing by the Department to determine compliance with the above limitation. [s. NR 439.06(8), Wis. Adm. Code] *</p> <p>(2) The recordkeeping and monitoring requirements for particulate matter will also serve in part to demonstrate compliance with the chromium emission limitation. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> <p>(3) If chromium or chromium compounds were present in coatings used during any calendar month, then the permittee shall record the following within fifteen (15) days after the end of each calendar month in which chromium-containing coatings were used: the HAP content of each material (including solvents) that contain chromium and chromium compounds; and the total monthly emissions of these HAPs, combined. [ss. NR 439.04(1)(a) and (d), Wis. Adm. Code] *</p> |
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|  |  | of chromium and chromium compounds in pounds per month by multiplying monthly material usage of materials that contain these HAPs by the total chromium and chromium compounds content content, of that material. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]* |  |
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| K. OTHER CONDITIONS APPLICABLE TO THE ENTIRE FACILITY  |   |   |
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| Condition type   | a. Conditions   | a. Compliance demonstration   |
| 1. Facility VOC emissions  | <p>(1) Volatile organic compounds (VOC) emissions from the facility may not exceed 41,500 pounds VOC per month averaged over any 12 consecutive months. [s. 285.65(7), Wis. Stats.]</p> <p>[This condition is established so that VOC emissions do not exceed 250 tons per year from the facility and the facility is not subject to PSD review under s. NR 405.08, Wis. Adm. Code.]</p>  | <p>(1) Unless the Department requires otherwise, the compliance demonstration methods of the individual processes shall demonstrate compliance with the facility VOC limits. [s. NR 407.09(1)(c)1.b., Wis. Adm. Code]</p> <p>(2) The amount of VOC shall be calculated for each individual material used in each process and added together to derive the monthly total. [s. 285.65(7), Wis. Stats., and s. NR 439.04(3), Wis. Adm. Code]</p> |
| 2. Alternate Operating Scenario: Use of raw materials not included in the permit application | <p>(1) If the permittee has the capability to burn or use a raw material not included in the application reviewed for this permit, the permittee may use this material without first obtaining a construction permit provided the following conditions are met:</p> <p>(a) The source has continuously had such design capability to burn or use the raw material.</p> <p>(b) The use will not cause or exacerbate the violation of an ambient air quality standard or an ambient air increment.</p> <p>(c) The use is not prohibited by any permit, plan approval or special order applicable to the source.</p> <p>(d) The use will not result in a net emissions increase of a hazardous air contaminant above the threshold amount listed in Tables 1 to 5 of ch. NR 445, Wis. Adm. Code, or the product of the following terms is equal to or less than 1.0:</p> $\left\{ \frac{\text{TLV (old substance)}}{\text{TLV (new substance)}} \right\} \times \left\{ \frac{\text{Emissions (proposed new substance)}}{\text{Emissions (permitted old substance)}} \right\}$ | <p>(1) Any calculations and supporting material required to demonstrate compliance with this Condition shall be kept on file by the permittee. [ss. NR 407.09(1)(c)2. and NR 439.04(1)(d), Wis. Adm. Code]</p>  |



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|  | <p>(e) The use will not result in a violation of any emission limit in chs. NR 405, 408, 409, and 415 to 436, Wis. Adm. Code.</p> <p>(f) The use will not subject the source to any standard or regulation under s. 112 of the Clean Air Act (42 USC 7412).</p> <p>[s. NR 406.04(4)(a), Wis. Adm. Code]</p>  |  |
| <p>3. 40 CFR Part 63, Subpart Mmmm: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products</p> <p>NOTE: The entire text of Subpart Mmmm is attached to this permit as Appendix B.</p> | <p>(1) The owner or operator of an affected source shall notify the Department in writing that the source is subject to 40 CFR Part 63, Subpart Mmmm. The notification, which shall be submitted not later than January 2, 2005 and shall provide all of the following information:</p> <p>(a) The name and address of the owner or operator.</p> <p>(b) The address where the affected source is located.</p> <p>(c) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.</p> <p>(d) A brief description of the nature, size, design and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant, or, if a definitive identification is not yet possible, a preliminary identification of each point of emission for each hazardous air pollutant.</p> <p>(e) A statement of whether the affected source is a major source or an area source. [s. NR 460.08(2)(b), Wis. Adm. Code, and 40 CFR s.63.3910(b)]</p> <p>(2) On and after January 2, 2007, the permittee must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified below, except as specified in 40 CFR s.63.3890(c), determined according to the requirements in 40 CFR</p> | <p>(1) You must include all coatings (as defined in 40 CFR s.63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in 40 CFR s.63.3890. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section.</p> <p>You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by 40 CFR s.63.3930(c), and you must report it in the next semiannual compliance report required in 40 CFR s.63.3920.</p> <p>(a) <u>Compliant material option.</u> Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR s.63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of 40 CFR ss. 63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.</p> |

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|   | <p>s.63.3941, s.63.3951, or s.63.3961.</p> <p>(a) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.</p>  | <p>(b) <u>Emission rate without add-on controls option</u>. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR s.63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of 40 CFR ss. 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.</p> <p>(c) <u>Emission rate with add-on controls option</u>. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission</p>   |
| <p>4. State Hazardous Air Pollutant (Revisions to ch. NR 445, Wis. Adm. Code)</p> | <p>(1) After the applicable final compliance date under s. NR 445.08(6), the permittee may not cause, allow, or permit emissions of a hazardous air contaminant listed in Table A of ch. NR 445, Wis. Adm. Code, in such quantity or concentration or for such duration as to cause an ambient air concentration of the contaminant off the facility's property that exceeds the concentration in column (g) of Table A for the contaminant, <u>unless</u> granted an extension by the Department under s. NR 445.08(9), Wis. Adm. Code. The permittee may request approval of an alternative to this emission limitation under s. NR 445.07(1)(b), Wis. Adm. Code. Some or all emissions of a contaminant may be exempt from either type of limitation, if the emissions qualify under s. NR 445.07(5), Wis. Adm. Code. [s. NR 445.07(1)(a) to (b), Wis. Adm. Code] *</p> <p>(2) After the applicable final compliance date under s. NR 445.08(6), the owner or operator of a source that emits a hazardous air contaminant for which a control requirement is identified in column (i) of Table A in a quantity greater than the amount listed in column (c), (d), (e) or (f) of Table A for the</p> | <p>(1) In accordance with the ("safe harbor") provisions in s. NR 445.06, Wis. Adm. Code, and the emission threshold use requirements in s. NR 445.07(6), Wis. Adm. Code, the permittee shall comply with all emission limitations that are applicable to the facility by demonstrating compliance with all applicable requirements under s. NR 445.08. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code] *</p> <p>(2) For each control requirement identified as applicable to the facility, the permittee shall comply with each control requirement according to the procedure in s. NR 445.08(2)(f). [ss. s. NR 445.07(1)(c), and s. NR 407.09(4)(a)3.b., Wis. Adm. Code]</p> <p>* (3) The permittee shall document compliance with limitations by meeting all applicable recordkeeping, reporting, notification, and other requirements under s. NR 445.08, Wis. Adm. Code. [ss. NR 439.04(1)(d)] *</p> <p>(4) Whenever any hazardous air pollutant concentration or emission rate testing of any material is required for demonstrating compliance, the permittee shall use a test method and testing protocol approved by either the USEPA or the Department. [ss. NR 407.09(1)(c)1.a. &amp; 4(a)1. and NR 439.06(8), Wis. Adm. Code]</p> |

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|   | contaminant shall control emissions of the contaminant to the level identified in column (i) of the table, <u>unless</u> granted an extension by the Department under s. NR 445.08(9), Wis. Adm. Code. [s. NR 445.07(1)(c), Wis. Adm. Code] *  |  |
| 5. Table substances, Ch. NR 445, Wis. Adm. Code | <p>(1) Ambient air concentration off property of Table 1 substances shall not exceed ten percent of the threshold limit value -time weighted average established by the American conference of governmental industrial hygienists in the indices for 1987 - 1988, incorporated by reference in s. NR 484.11 for any one-hour averaging period. [s. NR 445.05(1)(b), Wis. Adm. Code] *</p> <p>(2) Ambient air concentration off property of Table 4 substances shall not exceed ten percent of the threshold limit value -time weighted average established by the American conference of governmental industrial hygienists in the indices for 1990 - 1991, incorporated by reference in s. NR 484.11 for any one-hour averaging period. [s. NR 445.05(4)(b), Wis. Adm. Code] *</p> <p>*(3) If the total annual emissions of a Table 3A compounds exceeds its de minimus level then the facility must propose lowest achievable emission rate technology (LAER) to achieve compliance. [Table 3A, ch. NR 445 and s. NR 445.04(3)(a), Wis. Adm. Code]</p> <p>*(4) If the total annual emissions of a Table 3B compounds exceeds its de minimus level then the facility must propose best available control technology (BACT) to achieve compliance. [Table 3B, ch. NR 445 and s. NR 445.04(3)(b), Wis. Adm.</p> | <p>(1) The permittee shall demonstrate the facility's compliance with all ambient air quality standard(s) for state HAP emissions within 18 months of the date of the issuance of this permit. Quarterly progress reports shall be submitted to the Department detailing the efforts and upcoming plans made in demonstrating compliance with the state HAP ambient air quality standard(s). These reports shall be submitted according to the dates outlined below. These progress reports should summarize all of the actions and the dates that these actions were taken towards demonstrating compliance over the past quarter. The reports should also present the expected actions that will be undertaken in each upcoming quarter.</p> <p>(a) First quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(b) Second quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(c) Third quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(d) Fourth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(e) Fifth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance;</p> <p>(f) Sixth quarter progress report required to be submitted to Department by: Date to be inserted at time of issuance; and</p> <p>(g) As a supplement to the final progress report, the permittee shall submit an air quality modeling analysis and additional documents (e.g., stack blueprints, control device documentation, emission calculations) as necessary, to the Department demonstrating that the facility is in compliance with the particulate matter ambient air quality standard(s).</p> |

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|                      | Code]<br><br>* (5) The permittee shall submit periodic progress reports. [s. NR 407.09(1)(c)3., Wis. Adm. Code]   | (2) Included in the final submittal shall be an operation permit revision request containing proposed emission limits, compliance demonstration methods, and monitoring, recordkeeping and testing requirements. These conditions shall be based on the results of the HAP air quality modeling analysis and subsequent actions taken by the facility to demonstrate compliance with the HAP ambient air quality standard(s). Once approved by the Department, these conditions shall be followed by the facility. [s. NR 407.09(4)(b), NR 439.07(10), Wis. Adm. Code and 285.64(1), Stats.]   |
| 6. Emissions Testing | (1) At times specified in this permit, or when requested by the Department, the permittee shall perform emissions testing. [ss. NR 407.09(1)(c)1.a. and NR 439.075(1)(b), Wis. Adm. Code] | (1) Whenever compliance emission testing is required by the Department:<br><br>(a) Unless the Department requires or approves the performance of a test at less than capacity, all compliance emission tests shall be performed with the equipment operating at capacity or as close to capacity as practicable.<br>(b) The reference test methods outlined in this permit shall be used, unless an alternate U.S. EPA approved test method is approved by the Department in writing.<br>(c) The Department shall be notified in writing at least 20 business days in advance of a compliance emission test to provide the Department an opportunity to have a representative present to witness the testing procedures.<br>(d) At the time of the notification a compliance emission test plan shall be submitted to the Department for approval.<br>(e) The notification and test plan shall be submitted to the Wisconsin Department of Natural Resources, Air Management Program, Milwaukee Service Center, P.O. Box 12436, 2300 North Dr. Martin Luther King Jr. Dr., Milwaukee, Wisconsin, 53212. [s. NR 439.07(2), Wis. Adm. Code]<br>(f) Two copies of the report on the test results shall be submitted to the Department of Natural Resources, Southeast Region Headquarters, 2300 North Dr. Martin Luther King Jr. Dr., PO Box 12436, Milwaukee WI 53212 for evaluation within 60 days following the tests. [ss. NR |

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|                       |   | <p>439.07(1), (2) and (9), Wis. Adm. Code]</p> <p>(2) The emission test report shall include, but need not be limited to, the following information:</p> <p>(a) A detailed description of the process tested and the sampling procedure employed.</p> <p>(b) A log of the operating conditions of the process tested and any associated air pollution control device.</p> <p>(c) A summary of results expressed in units consistent with the emission limitation applicable to the source.</p> <p>(d) Sample calculations employing all the formulas used to calculate the results.</p> <p>(e) The field and laboratory data for each repetition of the test.</p> <p>(f) Calibration data for the components of the sampling train used.</p>  |
| 7. Compliance Reports | <p>(1) The permittee shall submit periodic monitoring reports and compliance certifications. [s. NR 407.09(1)(c)3., Wis. Adm. Code]</p> | <p>(1) Monitoring Reports</p> <p>(a) The permittee shall submit the results of monitoring required by this permit to the Department every 6 months. In lieu of submission of all monitoring results, a summary of the monitoring results may be submitted to the Department. The summary shall include sufficient data for the Department to determine whether the source is in compliance with the applicable requirements to which the monitoring relates.</p> <p>(b) The time periods to be addressed by the submittal are January 1 to June 30 (due by September 1) and July 1 to December 31 (due by March 1 of the following year).</p> <p>(c) The report shall be submitted to the Wisconsin Department of Natural Resources, Southeast Region Headquarters, 2300 North Dr. Martin Luther King Jr. Dr., PO Box 12436, Milwaukee WI 53212 by March 1 and September 1 following the end of each reporting period.</p> <p>(d) All deviations from and violations of applicable requirements shall be clearly identified in the submittal.</p> <p>(e) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report. [s. NR 439.03(1)(b),</p> |

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|   |   | <p>Wis. Adm. Code]</p> <p>(2) Compliance Certification</p> <p>(a) The permittee shall submit an annual certification of compliance with the requirements of this permit to the Wisconsin Department of Natural Resources, Southeast Region Headquarters, 2300 North Dr. Martin Luther King Jr. Dr., PO Box 12436, Milwaukee WI 53212 and to Compliance Data - Wisconsin, Air and Radiation Division, U.S. EPA, 77 W. Jackson, Chicago, IL 60604.</p> <p>(b) The time period to be addressed by the report is from January 1 to December 31.</p> <p>(c) The report shall be submitted to the Southeast Region Headquarters no later than March 1, following the end of each reporting period.</p> <p>(d) The information included in the report shall comply with the requirements of Part II s. N of this permit.</p> <p>(e) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report. [s. NR 439.03(1)(c), Wis. Adm. Code]</p> |
| 8. Controls   | (1) The permittee shall maintain and use existing control equipment to control emissions at all times its processes are in operation. [s. NR 407.09(1)(a), Wis. Adm. Code]  | (1) The permittee shall perform periodic internal inspections of the control equipment to ensure that the control equipment is operating properly. The time interval between inspections may not exceed twelve (12) months. [s. NR 407.09(4)(a)1., Wis. Adm. Code]   |
| 9. Stack heights<br><br>Note: Stack requirements are included because the source was modeled with these stack parameters and it was determined that no NAAQS would be violated at these stack | <p>(1) Unless provided otherwise, the following stacks may not be equipped with a device which impedes the upward flow of the exhaust gases. [s. 285.65(3), Stats.]</p> <p>(2) Stack heights must be at least the following heights above ground level and the inside stack diameters at the outlet may not exceed the dimensions set forth in the following table:</p> | <p>(1) Whenever requested by the Department, the permittee shall provide current physical stack parameters. [s. NR 407.09(4)(a), Wis. Adm. Code]</p> <p>(2) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the physical stack parameters. [s. NR 439.04(1)(d), Wis. Adm. Code]</p>  |

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| heights. [s.<br>285.65(3), Stats.] |  |  |
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| Stack | Height (ft) | Height (m) | Direction/Rainhat | Diameter (ft) | Diameter (m) |
|-------|-------------|------------|-------------------|---------------|--------------|
| S08   | 40.00       | 12.19      |                   | 0.83          | 0.25         |
| S10   | 40.00       | 12.19      | up/no             | 4.09          | 1.25         |
| S11   | 35.01       | 10.67      | up/no             | 1.09          | 0.33         |
| S12A  | 14.67       | 4.47       | up/yes            | 1.33          | 0.41         |
| S12B  | 14.99       | 4.57       |                   | 1.33          | 0.41         |
| S12C  | 17.42       | 5.31       |                   | 2.17          | 0.66         |
| S12   | 40.00       | 12.19      | up/no             | 2.88          | 0.88         |
| S13   | 26.18       | 7.98       | up/no             | 2.00          | 0.61         |
| S14   | 20.01       | 6.10       | up/no             | 2.83          | 0.86         |
| S21   | 29.99       | 9.14       | up/no             | 2.59          | 0.79         |
| S22   | 28.33       | 8.64       | up/yes            | 1.00          | 0.30         |
| S50   | 35.00       | 10.67      | up/no             | 1.50          | 0.46         |
| S51   | 35.00       | 10.67      | up/no             | 2.73          | 0.83         |
| S52   | 35.00       | 10.67      | up/no             | 1.33          | 0.41         |
| S53   | 12.50       | 3.81       | up/no             | 1.00          | 0.30         |
| S54   | 34.08       | 10.39      |                   | 1.50          | 0.46         |
| S55   | 13.32       | 4.06       |                   | 0.83          | 0.25         |
| S56   | 18.18       | 5.54       |                   | 1.00          | 0.30         |
| S57   | 27.49       | 8.38       | up/no             | 0.50          | 0.15         |
| S58   | 18.67       | 5.69       |                   | 0.67          | 0.20         |
| S59   | 28.67       | 8.74       | up/no             | 2.00          | 0.61         |
| S60   | 29.10       | 8.87       | up/no             | 0.83          | 0.25         |
| S61   | 30.21       | 9.21       | up/no             | 1.00          | 0.30         |
| S62   | 27.99       | 8.53       |                   | 0.67          | 0.20         |
| S63   | 28.90       | 8.81       | up/no             | 0.83          | 0.25         |
| S64   | 28.90       | 8.81       | up/no             | 0.83          | 0.25         |
| S65   | 27.99       | 8.53       |                   | 0.67          | 0.20         |
| S66   | 28.08       | 8.56       |                   | 1.00          | 0.30         |
| S67   | 28.25       | 8.61       |                   | 0.67          | 0.20         |
| S68   | 28.25       | 8.61       |                   | 0.67          | 0.20         |
| S69   | 28.25       | 8.61       |                   | 0.67          | 0.20         |
| S70   | 27.99       | 8.53       |                   | 1.00          | 0.30         |